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7 UNITED STATES BANKRUPTCY COURT
8 SOUTHERN DISTRICT OF CALIFORNIA

9 IN RE:

10 Case No.: 17-01116-CL7

11 Armando Rodriguez and Hilda Rodriguez,
12 Debtors/Movants.

13 JOINT DECLARATION OF DEBTORS IN
14 SUPPORT OF AMENDED MOTION TO
15 REOPEN CASE

16 We, Armando Rodriguez (“Debtor 1”) and Hilda Rodriguez (“Debtor 2”), the Debtors in the
17 above-referenced case, jointly declare the following:

18 1. We are adults over the age of eighteen and competent to make this declaration. The facts
19 and matters stated herein are true and based on our knowledge and belief, and if called as
20 witnesses, we would testify thereto as follows.

21 2. A Chapter 7 Voluntary Petition with Case No. 17-01116-CL7 was filed on our behalf by
22 our attorney, John F. Lenderman, on 02/28/2017. We received our discharge orders on
23 06/07/2017, and our case was closed on 06/12/2017.

24 3. At the time of filing, there were two Abstracts of Judgment recorded against Debtor 2.

25 4. We did not have the sufficient funds during the pendency of our bankruptcy case to pay
additional attorney’s fees for Motions To Avoid Lien.

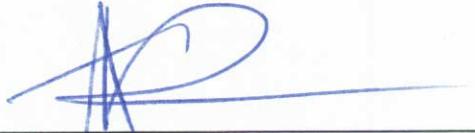
5. We were unable to close escrow on a home sale last year because of the judgment liens
created by the Abstracts of Judgment.

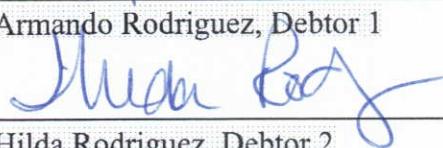
JOINT DECLARATION OF DEBTORS IN SUPPORT OF AMENDED MOTION TO REOPEN CASE - 1

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6. We need our case to be reopened so that we may pursue Motions To Avoid Liens so that
we can sell our home.
7. Therefore, we respectfully ask the Court to approve our Motion to Reopen Case.

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10 We, Debtor 1 and Debtor 2, declare under penalty of perjury under the laws of the United
11 States of America that the foregoing is true and correct.

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Dated: 05/03/2023


Armando Rodriguez, Debtor 1


Hilda Rodriguez, Debtor 2